

Cactus Computer Co.  
211 S. Main St.  
Moscow, ID 83843

February 8, 2005

Reference: 04-440 Petition for DSL Forbearance by Verizon

Dear Sirs:

I've read the comments made by Larry Summers of WTS Online, Inc. and, as a rural ISP, cannot agree with him more on his representation of the facts and consequences of granting Forbearance to Verizon. I would like to add some additional observations regarding the public and national interest in this matter.

We too are a computer store with a service department as well as an ISP. As such we supply to our customers a full range of services that cannot be met by larger companies such as Verizon. Even though Verizon has provided dialup service almost as long as we have, Verizon has never been competition in the dialup Internet business. Locally they have less than 1% of the market despite their having first crack at customers when they order a telephone and despite their predatory introductory pricing. No phone company has had much success in the dialup arena. And the sole reason for this is poor customer service.

Broadband Reports ([www.dslreports.com](http://www.dslreports.com)) rates Verizon the worst of all DSL providers for which they have sufficient reports to make a determination. Verizon also ranks lowest in customer service of all those rated providers. About 25% of those customers who switch to Verizon Online because of their lower pricing switch back to us within 60 days due to service and support issues. 90% of our customers have not switched to Verizon Online despite multiple phone calls, bill suffers, and so on. That is, the majority of our customers prefer to pay nearly twice as much for DSL from us to get good service. Forbearance will deny these DSL customers the service they want and are willing to pay for if it is available to them.

Small ISP's are able to manage their networks much better than large ISP's; it has always been one of our advantages. We are able to detect behaviors (patterns of access) that indicate the presence of malware on customers' computers. We can block those computers from doing harm to others as well as notify the customer and help them resolve the problem. Large broadband ISP's are not able to do this because of the way they aggregate traffic into pipes too large for this computationally intensive monitoring. It seems unconscionable to exclude those best able to protect the Nation's Internet infrastructure at the edge from participating. The Forbearance Verizon and other BOC's are requesting would have that result.

Sincerely,

C. Anthony Ray  
Vice President